

THE HONORABLE BARBARA ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILDWOOD TOWNHOME OWNERS  
ASSOCIATION, a Washington Non-Profit  
Corporation,

Plaintiff,

v.

AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY, S.I., a Wisconsin  
Company; and DOE INSURANCE  
COMPANIES 1-10,

Defendants.

No.: 2:21-cv-01080-BJR

STIPULATED MOTION FOR  
CONTINUING DISCOVERY CUTOFF,  
DISPOSITIVE MOTIONS DEADLINE,  
AND MOTIONS IN LIMINE DEADLINE

Plaintiff Wildwood Townhomes Owners Association (the “Association”) and  
Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this  
motion for a continuance of the discovery cutoff and dispositive motions deadline and  
respectfully request a short extension of the discovery cutoff, dispositive motions deadline,  
and the Motions in Limine Deadline.

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause  
and with the judge’s consent.” Good cause exists here because the parties are actively  
pursuing discovery in this matter but do to witness availability need a brief extension of the

deadlines to amicably schedule all necessary depositions. For purposes of judicial economy, the parties propose that the pretrial deadlines be continued pursuant to the below chart to enable both parties to amicably schedule discovery. The parties respectfully request that the Court extend the currently scheduled deadline as set forth Below. A proposed order is included herewith.

Event	Current Deadline	New Deadline
Discovery completed by	2/5/2023	2/24/2023
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	3/7/2023	3/27/2023
Motions in Limine	3/31/2023	5/1/2023

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the trial date and related pretrial deadlines due to the reasons set forth above.

DATED: January 10, 2023

<p>Lane Powell PC</p> <p>By: <u>/s/Stephania Denton</u>  Stephania Denton, WSBA #21920  dentons@lanepowell.com  Karla White, WSBA #59171  martinezwhitek@lanepowell.com</p> <p>Attorneys for American Family Mutual Insurance Company, S.I.</p>	<p>Stein, Sudweeks &amp; Stein, PLLC</p> <p>By: <u>/s/Cortney Feniello</u>  Jerry H. Stein, WSBA #27721  jstein@condodeflects.com  Justin D. Sudweeks, WSBA #28755  justin@condodeflects.com  Daniel J. Stein, WSBA #48739  dstein@condodeflects.com  Cortney M. Feniello, WSBA #57352  cfeniello@condodeflects.com</p> <p>Attorneys for Plaintiff Wildwood Townhomes Owners Association</p>
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**ORDER**

Based on the above Stipulated Motion, IT IS SO ORDERED that the pretrial deadlines be extended as follows:

Event	Current Deadline	New Deadline
Discovery completed by	2/5/2023	2/24/2023
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	3/7/2023	3/27/2023
Motion in Limine	3/31/2023	5/1/2023

No other deadlines or events are altered.

IT IS SO ORDERED this 23rd, day of January 2023.



THE HONORABLE BARBARA J. ROTHSTEIN

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2023, a copy of the foregoing ***Document*** and this ***Certificate of Service*** were served on counsel below as noted:

Attorneys for Defendant American Family  
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

SIGNED this 10<sup>th</sup> day of January, 2023, at Tukwila, Washington.

s/Zach Heafner

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